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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Administration Of The)	CC Docket No. 92-237
North American Numbering Plan)	Phases One and Two

REPLY COMMENTS

OF

THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

The Southern New England Telephone Company

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June 30, 1994

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THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

The Southern New England Telephone Company ("SNET") hereby submits its reply comments on the Notice of Proposed Rulemaking in CC Docket No. 92-237, released April 4, 1994.¹ Numerous parties commented on June 7, 1994.²

¹ In the Matter of Administration of the North American Numbering Plan, Notice of Proposed Rulemaking, CC Docket No. 92-237, FCC 94-79, released April 4, 1994 ("NPRM").

² The 46 parties who provided comments are: Ad Hoc TeleCommun. User Comm.; AirTouch Commun.; Allnet Commun. Svcs., Inc.; ALTS; Amer. Mobile TeleCommun. Assn., Inc.; Amer. Personal Commun.; Amer. Petroleum Institute; Amer. Public Commun. Council; Ameritech Operating Companies; ATIS; AT&T; Bell Commun. Research, Inc.; BellSouth TeleCommun., Inc.; Canadian Steering Comm. on Numbering; Cathey, Hutton & Assoc., Inc.; Cellular TeleCommun. Ind. Assn.; Cincinnati Bell Telephone Co.; Commun. Managers Assn.; Competitive TeleCommun. Assn.; Dean Brothers Publishing Co.; GTE Svc. Corp.; GVNW, Inc.; LCI, McCaw Cellular Commun., Inc.; MCI; MFS; Missouri Public Svc. Commun.; NARUC; Natl. Commun. Sys.; NECA; Nextel Commun., Inc.; NYNEX; OPASTCO; Pacific Bell & Nevada Bell; Personal Commun. Ind. Assn.; Rock Hill Tele. Co., et al; Southwestern Bell Corp.; Sprint; Telaccess; Telco Planning, Inc.; Tele-Commun. Resellers Assn.; Teleport Commun. Grp., Inc.; US West, Inc.; Vanguard Cellular Sys., Inc.; VARTEC.

I. The New NANPA Should Be A Non-Government Entity With Oversight From Both Industry and Government.

SNET believes that a non-governmental entity should be selected as the new North American Numbering Plan Administrator (NANPA) and that the Commission should establish a board to oversee the choice of and operation of the new NANPA. The board should include broad industry representation. The Commission should participate on the board as well as lend its authority, and should also accept responsibility for resolution of any disputes the oversight body is unable to resolve expeditiously. SNET believes that a non-governmental entity subject to the authority of the Commission and the industry strikes the appropriate balance needed for an effective NANPA.

II. Central Office Code Administration.

SNET strongly believes that the Commission should study the impacts of centralizing Central Office (CO) Code Administration before transfer to any entity. SNET believes that significant issues remain that must be resolved prior to the transfer. SNET agrees with USTA that a major function that CO Code Administrators perform today is to gather data used to predict and manage NPA expansion and to coordinate activities for NPA splits and realignments.³

As GTE⁴ so aptly pointed out, Bellcore NANPA's present functions are:

1. administering numbering resources for World Zone (WZ)1 fairly and impartially;
2. working with standards bodies, industry forums, national and international organizations, and appropriate governmental agencies, e.g., the Canadian

³ USTA Comments at page 8.

⁴ GTE Comments, pgs. 10 & 11.

Department of Communications and Caribbean administrations, as a means of achieving consensus on administrative procedures and design changes;

3. ensuring that conservation techniques are employed in the assignment and utilization of NANP resources;
4. ensuring the availability of NANP resources for legitimate applications;
5. adapting the NANP to the changing requirements of the telecommunications industry; and
6. representing NANP interests to national and global standards and telecommunications bodies.

The immediate transfer of CO code administration responsibilities to a new NANPA would add an additional level of complexity to the new administrator's responsibility -- one that is fundamentally different than the above list of NANP administrative functions.

As Southwestern Bell Corporation (SWB) explained in its comments,⁵ Local Exchange Carriers (LECs) "are often responsible for reporting code assignments to be published in the Local Exchange Routing Guide (LERG), which contains local routing data obtained from the Routing Data Base System (RDBS). This information reflects the current network configuration and scheduled network changes for all entities originating or terminating public switched telephone network calls within the NANP, excluding Canada. The LECs also report information for the Bellcore Rating Administrative Data System (BRADS) that contains NANP rating and billing information. If CO code assignment is transferred to the NANPA, a reassessment of the responsibility for data input into these systems must also be made."

Even Bellcore⁶ does not recommend immediate transfer of CO code assignments to a new entity because of the complexity.

⁵ Southwest Bell Comments at page 11.

⁶ Bellcore Comments at page 6.

Further, SNET agrees with GTE's⁷ serious concerns that the proper assignment of CO codes requires comprehensive understanding of the current state of the local network as well as its plans for an NPA Code split or overlay and the network costs associated with such undertakings.

Finally, SNET, along with other LECs, is concerned that centralized administration of CO codes will not consider local state public utilities commission involvement.⁸ SNET believes that CO code administration must maintain a local flavor and that the immediate transfer to a single centralized administrator will not permit a complete assessment of the options for local involvement.

III. Funding Should Be Based On Numbers Used And Assigned.

SNET believes fees should be charged based on the numbers used and assigned, and all countries participating should pay equal charges. Fees should not recover the costs of the Commission's oversight, only NANPA costs. While SNET believes that NECA could administer the funds to pay NANPA's costs, using NECA's existing funds or pools as the basis for cost recovery of the NANPA function is neither desirable or appropriate. As noted above, reasonable fees based on numbers used and assigned is the preferred method of funding.

IV. Summary.


The selection of a non-government entity subject to both Commission authority and industry oversight strikes the right balance for an effective NANPA. The new NANPA should not be burdened initially with the requirement to administer CO codes.

⁷ GTE Comments at page 11.

⁸ See Pacific Telesis Comments at page 6; SWB Comments at page 10; NYNEX Comments at page 10; and Ameritech Comments at pgs. 4 & 5.

Transfer of CO code administration to a centralized administrator should recognize the complexities involved and insure that local concerns are adequately cared for. NECA could administer funds to pay NANPA's costs, however, existing pools or funds should not be used.

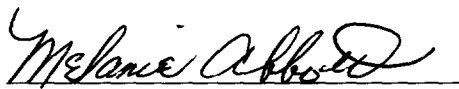
The Southern New England Telephone Company


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June 30, 1994

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Reply Comments, CC Docket No. 92-237, of The Southern New England Telephone Company was served this 30th day of June, 1994, by first class mail, postage prepaid, on the parties on the attached list.


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